

1 Mohammed Zafaranchi
2 88 Havenwood
3 Irvine, CA 92614
4 Defendant, filing pro se pending leave

FILED (DROP BOX)

JUL 01 2025

THE HONORABLE JOHN C. COUGHENOUR

BY WESTERN DISTRICT OF WASHINGTON DEPUTY

6 UNITED STATES DISTRICT COURT
7 WESTERN DISTRICT OF WASHINGTON
8 AT SEATTLE

9 UNITED STATES OF AMERICA,
10 Plaintiff,

11 v.

12 MOHAMMED ZAFARANCHI,
13 Defendant.

Case No.: CR22-122-JCC

**MOTION FOR LEAVE TO FILE PRO SE
MOTIONS REGARDING THE SPEEDY
TRIAL ACT**

NOTE ON MOTION CALENDAR:
JULY 1, 2025

15 **Notice:** This motion is filed concurrently with Defendant's Motion to Dismiss
16 Under the Speedy Trial Act and Motion to Expedite Briefing Schedule.

17
18 NOW COMES the Defendant, Mohammed Zafaranchi, appearing pro se, and
19 respectfully requests that this Honorable Court grant leave to file a **Motion to**
20 **Dismiss under the Speedy Trial Act (18 U.S.C. § 3161)**, despite currently being
21 represented by counsel.

22 **In Support, Defendant States:**

- 23
24 1. Defendant is represented by counsel who has declined to file a motion to
25 dismiss for violations of the Speedy Trial Act.
26

- 1 2. Defendant believes that more than seventy (70) non-excludable days have elapsed in
2 violation of the Speedy Trial Act, 18 U.S.C. § 3161(c)(1), based on the procedural history
3 of this case, and seeks to preserve this issue for the record and any potential future
4 review.
- 5 3. Counsel's decision not to file may result in the **waiver or forfeiture** of
6 statutory rights under the Speedy Trial Act, thereby causing potential
7 **prejudice** to Defendant's liberty interests.
- 8 4. The requested motion is narrow, fact-based, and not intended to delay or
9 disrupt proceedings, but solely to **protect Defendant's rights** and preserve
10 legitimate appellate issues.
- 11 5. Because hybrid representation is generally disallowed, Defendant
12 respectfully requests leave of Court to file not only the instant motion but
13 also all pro se motions, replies, and related documents concerning the
14 Speedy Trial Act, including but not limited to the Motion to Dismiss,
15 Emergency Motion to Stay, reply briefs, and any necessary emergency
16 applications to this Court or to the Ninth Circuit, to the extent counsel
17 declines to file such documents on Defendant's behalf.

18 The Ninth Circuit has recognized that, while hybrid representation is not
19 generally permitted, a district court has discretion to allow limited pro se filings
20 on discrete issues where counsel refuses to file and the defendant seeks to
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1 preserve important statutory rights. See United States v. Williams, 791 F.2d 1383,
2 1389 (9th Cir. 1986).

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4 Defendant further acknowledges that he previously sought a continuance
5 due to health issues, as documented by two separate medical professionals. The
6 Court denied that request. Defendant respectfully notes that preparing and filing
7 this pro se motion, as well as any intended Speedy Trial Act motion, was
8 undertaken out of necessity and with considerable difficulty, solely to preserve
9 statutory rights that would otherwise be permanently forfeited. This filing should
10 not be interpreted as evidence that Defendant's health has materially improved or
11 that he is fully able to participate in a complex jury trial at this time.
12

13
14 WHEREFORE, the Defendant respectfully asks this Honorable Court to grant
15 leave to file pro se all motions, replies, and related documents concerning the
16 Speedy Trial Act (18 U.S.C. § 3161), including but not limited to the Motion to
17 Dismiss, Emergency Motion to Stay, reply briefs, and any necessary emergency
18 applications, to the extent counsel declines to file such documents.
19

20 DATED this 1st day of July 2025.

21 Respectfully submitted,

22 /s/ Mohammed Zafaranchi,

23 Mohammed Zafaranchi

24 Defendant (pro se filing pending Court approval)

25 88 Havenwood, Irvine CA 92614
26

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 1st day of July, 2025, I caused a true and correct copy of the foregoing to be served as follows:

By hand-delivery to:

United States Attorney's Office – Western District of Washington

Attn: Seth C. Wilkinson, Lauren Watts Staniar, and Dane A. Westermeyer

700 Stewart Street, Suite 5220

Seattle, WA 98101

By email to Defendant's counsel of record:

David Z. Chesnoff – dzchesnoff@cslawoffice.net

Richard A. Schonfeld – rschonfeld@cslawoffice.net

Mark N. Bartlett – MarkBartlett@dwt.com

Dated: July 1, 2025

Respectfully submitted,
/s/ Mohammed Zafaranchi
Mohammed Zafaranchi
88 Havenwood
Irvine, CA 92614

EXHIBIT A

THE HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

MOHAMMED ZAFARANCHI,

Defendant.

Case No.: CR22-122-JCC

**(PROPOSED) ORDER GRANTING
DEFENDANT'S MOTION FOR LEAVE
TO FILE PRO SE MOTIONS
REGARDING THE SPEEDY TRIAL ACT**

The Court has considered the motion of Defendant Mohammed Zafaranchi, seeking leave to file pro se motions, replies, and related documents concerning the Speedy Trial Act (18 U.S.C. § 3161), notwithstanding current representation by counsel.

The Court finds that, for good cause shown and to preserve Defendant's statutory rights, the motion should be granted to the extent that counsel declines to file such motions on Defendant's behalf.

IT IS HEREBY ORDERED THAT:

- 1 1. Defendant Mohammed Zafaranchi is granted leave to file pro se motions, replies, and
2 related documents concerning alleged violations of the Speedy Trial Act, 18 U.S.C. §
3 3161;
- 4 2. This leave includes, but is not limited to, the Motion to Dismiss, Emergency Motion to
5 Stay, reply briefs, and any necessary emergency applications to this Court or the Ninth
6 Circuit;
- 7 3. This leave is granted only for filings related to the Speedy Trial Act and only to the
8 extent that counsel declines to file such documents on Defendant's behalf.
9

10 IT IS SO ORDERED.
11

12 DATED this ____ day of _____, 2025.
13

14
15 _____
16 JOHN C. COUGHENOUR
United States District Judge

17 Presented by:
18

19 /s/ Mohammed Zafaranchi,
Mohammed Zafaranchi
20 Defendant (pro se filing pending Court approval)
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